

Department of Energy

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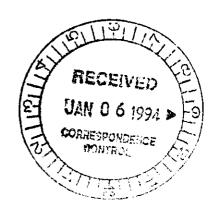
Dear Mses. Lerchen and Russell, and Enforcement Officer:

ADDENDUM 1 TO THE BACKLOG WASTE ANALYSIS PLAN

Enclosed for your review and approval is an addendum to the <u>Waste Analysis</u>
Plan for Confirmation or Completion of Tank Farms Backlog Waste Designation
(Backlog WAP), DOE/RL-93-70, Revision 1. This addendum is being submitted in accordance with Section 1.4.3 of the Backlog WAP.

Some modifications to the process are necessary at this time due to unforeseen operational issues that have arisen during implementation. The U.S. Department of Energy, Richland Operations Office (RL) and the Westinghouse Hanford Company (WHC) will implement these changes once the State of Washington Department of Ecology (Ecology) has been notified in order to prevent delays which could impact our ability to meet the September 1, 1994, compliance date.

Please review the proposed addendum and reply in accordance with the requirements set forth in Section 1.4 of the Backlog WAP.



If you have any questions or comments regarding this addendum, please contact Mr. A. B. Sidpara, RL, at 376-0933, or Ms. C. J. Geier, WHC, at 373-5617.

Sincerely,

B

James D. Bauer, Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

Q & Level

R. E. Lerch, Deputy Director Restoration and Remediation Westinghouse Hanford Company

cc w/encl:

- G. Hofer, EPA
- G. Jackson, WHC
- C. Geier, WHC
- R. Stanley, Ecology
- J. Atwood, Ecololgy
- D. Butler, Ecology

PROPOSED ADDENDUM 1

Waste Analysis Plan for Confirmation or Completion of Tank Farms Backlog Waste Designation, DOE/RL-93-70, Rev. 1

1. Section 5.7

SPECIFIC CHANGE:

Change the last paragraph of this section to read:

The amount of containers selected from any single waste stream will be based on the criteria in Section 5.7.1. Containers that are already opened for other reasons can be used as the containers on which chemical analysis will be performed. However, at least 25% of the samples must be obtained from containers that were not previously going to be opened. Containers chosen for sampling that were not already being opened will be selected randomly from a waste stream.

REASON FOR CHANGE:

This change is to clarify that the sampling may be biased. Samples being taken from containers already being opened are biased samples.

2. Section 6.3.3

SPECIFIC CHANGE:

1

Replace the numbered bullets with:

- (1) No detectable radioactivity above background and no observable chemical contamination For the purposes of this WAP, this waste will be managed as low-level. No waste codes apply.
- (2) <u>Detectable radioactivity, but no observable chemical contamination and having a field pH ≥ 5 and <9</u> For the purposes of this WAP, this waste will be managed as low-level. No waste codes apply.
- (3) Detectable radioactivity, but no observable chemical contamination and having a field pH ≥ 9 or <5 For the purposes of this WAP, this waste will be managed as low-level unless the characterization efforts prove otherwise. Waste codes will be added in accordance with this characterization effort if applicable. If characterization efforts indicate waste codes, Section 4.3.2 and Table 4.4 will be updated as applicable.
- (4) Debris with observable oil contamination For the purposes of this WAP, this waste will be managed as low-level unless the characterization efforts prove otherwise. Waste codes will be added in accordance with this characterization effort if applicable. If characterization efforts indicate waste codes, Section 4.3.2 and Table 4.4 will be updated as applicable.

- (5) Debris with observable paint contamination For the purposes of this WAP, this waste will be managed as low-level unless the characterization efforts prove otherwise. Waste codes will be added in accordance with this characterization effort if applicable. If characterization efforts indicate waste codes, Section 4.3.2 and Table 4.4 will be updated as applicable.
- (6) Debris Contaminated with Other Solids or Liquids For the purposes of this WAP, this waste will be managed as low-level unless the characterization efforts prove otherwise. Waste codes will be added in accordance with this characterization effort if applicable. If characterization efforts indicate waste codes, Section 4.3.2 and Table 4.4 will be updated as applicable.

REASON FOR CHANGE:

The F-Listed designation does not apply to low-level waste. It was inadvertently added during editing of the document. The mixture rule has not been applied to this waste. Waste codes will be added as applicable based on the results of the confirmation or completion of designation process outlined in the Backlog WAP.

3. Section 7.5.3 and 7.5.3.1.1

SPECIFIC CHANGE:

In addition to Thermal Analytical, Incorporated performing the analysis on backlog samples, Weston Laboratories will also be receiving samples.

REASON FOR CHANGE:

Weston has been added as a laboratory to increase DOE-RL/WHC laboratory capability. This addition will help to minimize sample turnaround times to ensure the September 1, 1994 date is met. All samples will continue to meet SW-846 protocol with the exception of the deviations already allowed in the WAP.

4. Section 8.0

SPECIFIC CHANGE:

The container files and documentation generated during the confirmation or completion of designation process will be maintained by Tank Farms at MO720, in the 200W Area. Tank Farms will keep track of the location of any documentation not maintained in these files.

REASON FOR CHANGE:

Due to space availability in MO279, the files must be moved to a location where they can be managed appropriately. Tank Farms will manage the files as part of their role in the processing of backlog waste.

5. Appendix B

SPECIFIC CHANGE: See Attached.

REASON FOR CHANGE: Additions have been made to the checklist to obtain additional information above and beyond the initial requirements of the Backlog WAP. Note that all of the original questions are on the checklist but they may not be in the same order as before. Flagging boxes have been added to the top of the checklist to provide a quick means to assess potential problems with a container. Note that no technical requirements have changed as a result of the proposed checklist.

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APPENDIX B

DOCUMENTATION ASSESSMENT

APPENDIX B

CONTENTS

| 1.0 | PURPO |)SE | • | | | | • | | • | • | | • | • | | | | | | | | • | • | | APP | B-1 |
|-----|-------|-----------------|------|-----|-----|------|-------|-------|----|---|-----|-----|----|---|---|---|---|--|---|---|---|---|---|-------|------|
| 2.0 | REQU1 | REMENTS . | • | | | • | • | • | • | • | | • | • | • | • | • | • | | ٠ | • | | | • | APP | B-1 |
| 3.0 | DOCUM | MENTATION | | | | | | | | | | | | | | | | | | | | | | APP | B-1 |
| | 3.1 | GENERAL . | | | | | | | | | | | | | | | | | | | | | | APP | B-1 |
| | 3.2 | THE HEADE | R . | | | | | | | | | | | | | | | | | | | | | APP | B-2 |
| | 3.3 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | B-2 |
| | 3.4 | QUESTION | 2 . | | | | | | | | | | | | | | | | | | | | | APP | B-2 |
| - | 3.5 | OUESTION | 3 . | | | | | | | | | | | | | | | | | | | | | APP | |
| | 3.6 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | |
| | 3.7 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | |
| | 3.8 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | |
| | 3.9 | Question | | | • | | | | | | | | | | | | | | | | | | | APP | |
| | 3.10 | QUESTION | | | • | | | | | | | | | | | | | | | | | | | APP | B-5 |
| | 3.11 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | |
| | 3.12 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | B-6 |
| | 3.13 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | B-6 |
| | 3.14 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | B-6 |
| | 3.15 | QUESTION | | | | | | | | | | | | | | | | | | | | | | APP | B-6 |
| | 3.16 | QUESTION | 14 | | | | | | | | | | | | | | | | | | | | | APP | B-7 |
| | 3.17 | QUESTION | 15 | | | | | | | | | | | | | | | | | | | | | APP | B-7 |
| | 3.18 | QUESTION | 16 | | | | | | | | | | | | | | | | | | | | | APP | B-7 |
| | 3.19 | OUESTION | | • | | | | | | | | | | | | | | | | | | | | APP | |
| | 3.20 | QUESTION | 18 | | | | | | | | | | | | | | | | | | | | | APP | |
| | 3.21 | QUESTION | 19 | | | | | | | | | | | | | | | | | | | | | APP | B-8 |
| | 3.22 | QUESTION | 20 | | | | | | | | | | | | | | | | | | | | | APP | B-9 |
| | 3.23 | QUESTION | 21 | | | | | | | | | | | | | | | | | | | | | APP | B-9 |
| | 3.24 | QUESTION | 22 | | | | | | | | | | | | | | | | | | | | | APP | B-10 |
| | 3.25 | QUESTION | 23 | | | | | | | | | | | | | | | | | | | | | APP | B-10 |
| | 3.26 | QUESTION | 24 | | | | | | | | | | | | | | | | | | | | | APP | B-11 |
| | 3.27 | SIGNATUR | E BL | OCH | | | | | | | | | | | | | | | | | | | | APP | B-11 |
| | | | | | | | | | | F | [Gl | JRE | :S | | | | | | | | | | | | |
| BI. | Waste | Document | atio | n í | .he | ·c l | : T 1 | i c 1 | t. | | | | | | | | | | | | | | | ADD R | F_1 |

APPENDIX B

DOCUMENTATION ASSESSMENT

This appendix describes the procedure used for completing the documentation assessment.

1.0 PURPOSE

Each container file covered under the scope of this plan will be evaluated to assist Tank Farms in determining:

- y The segregation of containers into waste streams
- y If there is sufficient knowledge concerning the container for designation at this stage of the process
- y Containers within a waste stream that require flagging for special management.

2.0 REQUIREMENTS

This appendix must be followed when completing the documentation assessment of the backlog waste in accordance with this WAP.

3.0 DOCUMENTATION ASSESSMENT

Each container of waste covered under the scope of this WAP will be evaluated in accordance with the 'Container Waste Documentation Checklist' (Figure BI). The BWISs for each container will be reviewed and compared to information gathered from the Tank Farms container files. The checklist will be completed at the time of the review. The checklist will be maintained as part of the container file for the container.

3.1 GENERAL

The Checklist consists of three page headers, twenty-four questions, and a signature section. All headers and questions 1 - 23 must be addressed by the Evaluator. The flag boxes are located at the top of the first page of the Checklist. All appropriate flag boxes <u>must</u> be marked. After completion, the Checklist must be reviewed by a designated reviewer.

3.2 THE HEADER

- 1. The Generating Unit PIN and the Backlog Number are verified and recorded in the top right-hand corner of all three pages of the Checklist.
- 2. The container is identified as a box or a drum and whether it is over packed by checking the appropriate box in the header of the first page.
- 3. The Sorting Code is addressed in Questions 4 and 5.

3.3 QUESTION 1

Is the waste type correct? (If not, give the correct waste type.)

- 1. If the answer to the question is NO:
 - a. Check the NO box.
 - b. Give the correct information in the 'Provide section and correct information' section.
 - c. Check the SWIF flag box.
- 2. If the answer to the question is YES, check the YES box.

3.4 QUESTION 2

Does the file documentation (i.e. inventory sheet) agree with the BWIS?

The purpose of this question is to verify that the information in all sections of the BWIS agrees with the other information in the container field file.

- 1. If the BWIS is the only document in the container field file:
 - a. Check the NO box.
 - b. Check the SWIF flag box.
 - c. Write a comment that there is only a BWIS in the file.
- 2. If the answer to the question is NO:
 - a. Check the NO box.
 - b. Give the correct information in the 'Provide section and correct information' section.
 - c. Check the SWIF flag box.
- 3. If the answer to the question is YES, check the YES box.

3.5 QUESTION 3

Do the PIN numbers on the BWIS match the PIN numbers on the inventory sheet?

Compare both the Backlog PINs and the Generating Unit PINs.

- 1. If the answer to the question is NO:
 - a. Check the NO box.
 - b. Check the NUMF flag box.
- 2. If the answer to the question is YES, check the YES box.

3.6 QUESTION 4

' 1

List the waste type for the container. Check the waste type which applies to the container and place the applicable waste type identifier in Position 1 of the Sorting Code.

Refer to Section 4.0 of the Backlog WAP for waste type descriptions and waste priority levels used to determine waste types.

Note the Debris Rule is utilized in this process to determine waste types for containers holding debris. For the purposes of this procedure, the debris should constitute approximately 60% or more, by volume, of the container contents.

- 1. Compare the waste type(s) listed on the BWIS with the information in the container field file.
 - a. If the waste types agree:
 - 1. Check the appropriate waste type box.
 - 2. Write the corresponding identifier in Position 1 of the Sorting Code in the header on each page of the Checklist.
 - b. If the waste types do not agree:
 - Check the SCW box.
 - 2. Place four zeros [0000] in Position 2 of the Sorting Code.
 - Proceed to Question 6.

3.7 QUESTION 5

List the Tank Farm Complex. Check the Tank Farm Complex which applies to the container and place the applicable complex identifier in Position 2 of the Sorting Code.

If a location listed in the container field file is not in Table 4.3 of the Backlog WAP, contact the Tank Farm Backlog Waste (TFBW) Manager for guidance on which complex applies to the container.

- 1. Compare the point of origin on the BWIS to the information in the container field file.
 - a. If the waste type is NLQ, CLQ, LLW, or SCW:
 - 1. Place four zeros [0000] in Position 2 of the Sorting Code.
 - b. If the points of origin agree:
 - 1. Check the appropriate box.
 - 2. Write the corresponding complex identifier in Position 2 of the header of each page of the Checklist.
 - c. If the points of origin do not agree:
 - 1. Contact the TFBW manager for direction.

3.8 QUESTION 6

Is the Dose Rate greater than or equal to 10 mrem/hr?

The dose rate is taken as the hottest spot on the outside of the container.

- 1. If the answer is YES, check the DSRF flag box.
- 2. If the answer is NO, check the NO box.
- 3. Enter the dose rate in the space provided.

3.9 Question 7

Is the waste a single waste type? (If no, list all types in the mixture.)

This question refers to the waste type determined in Question 4. If the container holds any amount of waste type other than that specified in Question 4, the MIXF flag box must be checked.

- 1. If the container holds one waste type, check the YES box.
- 2. If the container holds more than one waste type:

- a. Check the MIXF flag box.
- b. Check the NO box.

EXAMPLE: A container which contains 70% debris and 30% soil is noted as debris waste but is also noted it also contains soil.

3.10 QUESTION 8

Can the container have NDE performed on it? (If no, state reason.)

1. If the container is a box, has lead shielding, is designated as a soil in Question 4, or is over packed:

NOTE: The future availability and use of technologically advanced equipment may allow these types of containers to be examined using the NDE technique.

- a. Check the NO box.
- b. List the reason NDE cannot be performed.
- c. Check the NRTR flag box.
- 2. If the container does not fall under the previous question, check the YES box.

3.11 QUESTION 9

Does the documentation in the container indicate any waste which needs further analysis?

The purpose of this question is to identify containers that need analysis not identified under the steps of the Backlog WAP.

EXAMPLE: A waste matrix contains chemical XYZ which has not been characterized.

EXAMPLE: An inventory sheet exists but exact percents of waste are not listed.

- 1. If the answer to the question is YES:
 - a. List the waste(s) which require further characterization.
 - b. Check the ANAF flag box.
- 2. If the answer to the question is NO, check the NO box.

3.12 QUESTION 10

Is any of the documentation questionable such that the container needs further analysis?

EXAMPLE: A file contains contradictory information and there is no way of accurately determining what is in the container besides further analysis.

- 1. If the answer to the question is YES:
 - a. List the documentation which requires further analysis.
 - b. Check the ANAF flag box.
- 2. If the answer to the question is NO:
 - a. Check the NO box.

3.13 QUESTION 11

Does the waste contain asbestos?

- 1. If the answer to the question is YES:
 - a. List the percentage of asbestos waste, if available.
 - b. Check the ASBF flag box.
- 2. If the answer to the question is NO, check the NO box.

3.14 QUESTION 12

Does the waste contain lead or lead products (not used for shielding)?

EXAMPLE: Containers which contain lead not used for shielding, lead-lined gloves, electrical equipment, lead solder, lead based paint, incandescent light bulbs, etc.

- 1. If the answer to the question is YES:
 - a. Check the YES box.
 - b. Check the D008 flag box.
- 2. If the answer to the question is NO, check the NO box.

3.15 QUESTION 13

Does the waste contain liquids?

Liquids related to asbestos waste do not have to be flagged as liquids.

Distinguish between containerized and noncontainerized liquids.

- 1. If there is a possibility of liquid waste:
 - Answer the question YES.
 - b. Check the NLQF or CLQF flag box, as necessary.
- 2. If the answer to the question is YES:
 - a. Check the YES box.
 - b. Check the NLQF or CLQF flag box, as necessary.
- 3. If the answer to the question is NO, check the NO box.

3.16 QUESTION 14

Does the waste contain HEPA Filters?

HEPA filters originate from personal protective equipment and tank filters.

- 1. If the answer to the question is YES:
 - a. Check the YES box.
 - b. Check the HEPA flag box.
- 2. If the answer to the question is NO, check the NO box.

3.17 QUESTION 15

Does the waste consist of equipment or debris possibly contaminated with PCBs?

EXAMPLE: Light ballasts, transformers, capacitors, electrical equipment, oils, railroad maintenance waste, rags, etc. which may be contaminated with PCBs.

- If the answer to the question is YES:
 - Check the YES box.
 - b. Check the PCBF flag box.
- 2. If the answer to the question is NO, check the NO box.

3.18 QUESTION 16

Does an inventory sheet exist?

- 1. If the answer to the question is YES, check the YES box.
 - a. A copy of the container logbook entry is considered an inventory sheet. This logbook entry must show the

percentages of each waste and these percentages must add up to 100%.

- 2. If the answer to the question is NO:
 - a. Check the NO box.
 - b. Check the INVS flag box.

3.19 QUESTION 17

Is the inventory sheet certified with a signature and date?

Both the signature and date must be present to answer YES.

- 1. If the answer to the question is YES:
 - a. Check the YES box.
- 2. If the answer to the question is NO, check the NO box.

3.20 **QUESTION** 18

Is specific information related to the waste generating process contained/referenced in the file?

The intent of this question is to determine if there is additional information available describing waste generating activities which will allow Tank Farms to designate the waste prior to performing further characterization activities. A container request form cannot be used as generating information. A generator certification sheet can be used for generating information.

- 1. If the answer to the question is YES:
 - a. List additional information in the space provided.
 - b. Check the ADIF flag box.
- 2. If the answer to the question is NO, check the NO box.
- 3. If the answer to the question cannot be determined, write not applicable (N/A) in the 'List Additional Information' section of this question.

3.21 QUESTION 19

Are analytical results available for the container?

- 1. If analytical results are located in the container field file, the answer to the question is YES:
 - List any additional information in the space provided.

- b. Check the ADIF flag box.
- 2. If analytical results are referenced from another container in the same waste stream, the answer to the question is YES:
 - List the reference container field file.
 - b. Check the ADIF flag box.
 - c. Check the YES box.
- 3. If the answer to the question is NO, check the NO box.

3.22 QUESTION 20

Are specific dangerous constituents and percents listed or MSDSs provided in the field file?

If another container from the same location and generating activity has this information, that container is referenced.

- 1. If the answer is YES:
 - a. List any additional waste constituents with percents in the space provided.
 - b. Check the ADIF flag box.
 - c. Check the YES box.
- 2. If the answer to the question is NO, check the NO box.

3.23 QUESTION 21

1

Is documented process knowledge available from other containers from the same waste stream?

See Section 5.5.2 of the Backlog WAP for a list of documents possibly containing process knowledge.

EXAMPLE: Forty drums of soil were generated during a clean up operation of one area and several of the containers have already been characterized.

- 1. If the answer is YES:
 - a. List any additional information in the space provided.
 - b. Check the ADIF flag box.
 - c. Check the YES box.
- 2. If the answer to the question is NO, check the NO box.
- 3. If the answer to the question cannot be determined, write N/A in the 'List Additional Information' section of this question.

3.24 **QUESTION 22**

Are analytical results available from other containers from the same activity?

See Section 5.5.2 of the Backlog WAP for a list of documents possibly containing process knowledge.

EXAMPLE: Forty drums of soil were generated during a clean up operation and several of the containers have already been sampled.

- 1. If the answer is YES:
 - a. List any additional information in the space provided.
 - b. Check the ADIF flag box.
 - c. Check the YES flag.
- 2. If the answer to the question is NO, check the NO box.
- If the answer to the question cannot be determined, write N/A in the 'List Additional Information' section of this question.

3.25 QUESTION 23

. 1

Is other characterization information available for the waste stream?

See Section 5.5.2 for a list of documents possibly containing characterization information.

EXAMPLE: Forty drums of soil were generated during a clean up operation and several of the containers have already been characterized.

- 1. If the answer is YES:
 - List any additional information in the space provided.
 - b. Check the ADIF flag box.
 - c. Check the YES box.
- If the answer to the question is NO, check the No box.
- 3. If the answer to the question cannot be determined, write N/A in the 'List Additional Information' section of this question.

3.26 QUESTION 24

Does adequate documentation for designation for storage exist (is the container ready for an SDAR)?

This question is the responsibility of the Reviewer.

Check the appropriate box based upon the responses to questions 14 through 23 of the Checklist and all additional information contained in the field file.

If the answer to the question is YES, check the AQF flag box and forward the file to the Tank Farm Backlog Manager for further review.

3.27 SIGNATURE BLOCK

- 1. The Evaluator:
 - a. Prints their name
 - b. Signs and dates the checklist upon completion of the assessment-all questions must be addressed with an answer, by writing N/A, or by writing an appropriate comment.
 - c. Any appropriate comments are added in the space provided.
 - d. The Checklist is given to the Reviewer for review.
- 2. The Reviewer reviews the Checklist and the container field file to assure the following (all marks made by the Reviewer are done so in blue ink, initialed, and dated):
 - a. All appropriate flags and boxes have been marked.
 - All question have been addressed.
 - c. The Generation PIN and the Backlog PIN correspond.
 - d. No obvious errors have been made.
 - e. The CHANGES box is checked, if any changes are made.
 - f. The Reviewers name is printed, signed, and dated.

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| 8. | Can the container have NDE performance Reason: | ormed on it? (If no, state re | • | ı 🛭 Yes | □ No | (check NRTR flag) |
| 9. | Does the documentation in the collist waste(s): | - | | analysis? | Yes Icheck ANAF 1 | leg) 🗆 NO |
| 10. | Is any of the documentation que List documentation: | | | analysis? | Yes (check ANAF f | leg) D No |
| 11. | Does the waste contain asbestos | ? LIST PERCENTAGE: | <u> </u> | ☐ Yes | (check ASBF flag) | □ No |
| 12. | Does the waste contain lead or | lead products (not used for s | hielding)? | □ Yes | (check D008 flag) | □ No |
| 13. | Does the waste contain liquids? | | | □ Yes | (check NLQF or CLQF flag) | D No |
| 14. | Does the waste contain HEPA Fil | ters? | | ☐ Yes | (Check HEPA flag) | □ No |
| 15. | Does the waste consist of equip | ment or debris possibly conta | minated with PCBs? | ☐ Yes | (Check PCBF flag) | □ No |
| 16. | Does an inventory sheet exist? | | | □ Yes | □ No | (check INVS flag) |
| 17. | Is the inventory sheet certified | d with a signature and date? | | ☐ Yes | □ No | |
| 18. | Is specific information related Additional Information: | to the waste generating proc | ess contained/refe | renced in th | ne file? Dyes _{(chec} | k ADIF flag) D NO |
| 19. | Are analytical results available List additional information: | | | | (check ADIF flag) 🗓 NO | |
| 20. | Are specific dangerous waste con | nstituents and percents liste | d or MSDSs provide | ed in the fie | | |
| | | | | | IDE USBI CI 110 | |

94/3221.0543

| (| CONTAINER WASTE DOCUMENTATION | SORTING CODE: | -0 | BACKLOG PIN: BL00-MAP |
|------|---|--|---------------------|--|
| | CHECKLIST, REV. 0 | (Position 1) (Posit | GENERA | TING UNIT PIN: |
| 21. | Is documented process knowledge List additional information: | available from other containers | from the same waste | e stream? D Yes (check ADIF flag) D No |
| 22. | Are analytical results availabl List additional information: | e from other containers from the | same activity? | ☐ Yes (check ADIF flag) ☐ NO |
| 23. | Is other characterization infor List additional information: | mation available for the waste s | | ☐ Yes (check ADIF fleg) ☐ NO |
| 24. | DOES ADEQUATE DOCUMENTATION FOR If YES, send the file to the Ba | DESIGNATION FOR STORAGE EXIST? cklog Manager for further review | • | ☐ Yes (check AQF flag) ☐ No |
| Prir | LUATOR: nted Name: nents: | Signature/Date: | | |
| Prin | IEWER: nted Name: NGES D Yes D No Comments: | Signature/Date: | | |
| | | | | |

Figure B1. Waste Documentation Checklist.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

J. D. Bauer, RL (J. C. Biagini, WHC) M. Lerchen, WDOE L. Russell Incoming 9400002 Xref 9360942

Subject: ADDENDUM 1 TO THE BACKLOG WASTE ANALYSIS PLAN

| INTERNAL DISTRIBUTION | | | | | | | | | |
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^{*}already have enclosure.